

Burnley Borough Council,
Regeneration & Planning Policy,
19 Parker Lane,
Burnley BB11 2BY



92 PRINTERS FOLD,
LOWERHOUSE,
BURNLEY BB12 6PG

Tel. [REDACTED]

Wed. 24/8/16

Dear Sir/Madam,

I am writing on behalf of the Burnley Wildlife Conservation Forum in response to Burnley's New Local Plan, Preferred Options consultation. The Forum have a number of suggestions for alterations & some objections to the contents of the Local Plan, Preferred Options document as outlined below.

New Development Boundaries replacing the present Urban Boundaries Reasons for objection The 'Preferred Options' proposes changing the 'Issues & Options' three Urban Boundaries of Burnley, Hopton & Worsthorne to a new series of twelve Development Boundaries. The main Development Boundary for Burnley proposes to expand the existing 'Issues & Options' main Urban Boundary for Burnley to accommodate all the new Housing & Employment plots of land proposals contained in the 'Preferred Options' which are located outside of the 'Issues & Options' main Urban Boundary for Burnley which are on greenfield sites & form part of the open countryside of the present rural area & also proposed is the creation of a series of 9 new Development Boundary areas located within the existing rural area in the countryside of the eastern part of the Borough at home Bottom, Hurstwood, Meseclough, Overtown & the Cliviger Valley between Walk Mill & Holme Chapel & in the south at Dunrocksnow.

The 'Issues & Options' three Urban Boundaries provide a straightforward & clear distinction in the Borough between what is the present urban areas of Burnley, Hopton & Worsthorne & what is the present rural area whereas the 'Preferred Options' proposed new Development Boundaries shrink the rural area adjacent to the 'Issues & Options' main Urban Boundary for Burnley & in addition creates 9 new separate outlying Development Boundary areas in the countryside of the 'Issues & Options' rural area which would also shrink the rural area. We object to the proposed 12 new Development Boundary areas because they will facilitate new housing & employment developments on greenfield sites in the open countryside of the present rural area of the Borough which would have adverse effects on Burnley achieving sustainability, reducing climate change ^{providing} a net gain for nature & consequently the 'Issues & Options' 3 urban boundaries need to be reinstated.

Rationale for objections to proposed housing & employment developments outside of the present Urban Boundaries

Employment The Population Section, page 12 para. 2.2.2, projects a population at the end of the New Local Plan of 86,885 in 2032, a fall of 2k2 from 2012. Therefore Burnley will have a flattened working age population which will stabilize at around the present level during the 20 years of the New Local Plan so this can be accommodated by the present level of employment capacity & therefore there is no need to plan for an increase in Burnley's employment capacity which would exacerbate climate change, reduce environmental sustainability & adversely affect biodiversity.

In particular, with the new Burnley Bridge Business Park estimated to have a capacity to generate 1500 jobs, the new Vision Park at Princess Way, spare capacity on existing business parks, plus business development opportunities on urban brownfield sites, there is no need to provide extra capacity in the form of new business parks or extensions to existing business parks on greenfield or Green Belt land, which will achieve the h.h. Development Strategy's "Focusing development on urban areas" on page 47, para. 4.4.2

Housing The Housing section's page 13 para. 2.3.5 states that there were 2,458 empty homes in the Borough in October 2014. The vast majority of these 2,458 empty dwellings are located in Burnley's older terraced housing areas where they are significantly contributing to housing blight & thus mitigate against the restoration & rejuvenation of these areas of older terraced housing which according to the 2011 Census contribute 50.1% of Burnley's housing stock, p. 13, para. 2.3.1. Policy S.P.2's 'Housing Requirement 2012-2032', table 1 page 41, presents a 'residual requirement to be met by site allocations' of 2753 dwellings. This figure takes into account a re-occupation of 120 empty properties targeted in the Council's 'Vacant Properties Initiative' for the 2016/17 to 2018/19 period, an average of 40 empty properties to be re-occupied per year. Reducing the 2,458 empty homes figure by this 120 properties to be re-occupied leave a large number of 2,338 presently empty houses remaining as in 2019. Because of this present re-occupation rate of 40 properties per annum it would take at least 58 years to re-occupy these 2,338 empty houses it is a reasonable conservative estimate that during the remaining 13 years of the New Local Plan period from 2019 to 2032, at this average of 40 re-occupations per annum, that at least a further 520 empty properties will become re-occupied, reducing the residual requirement from 2,753 to at the most 2,233 dwellings.

The most important housing objective for the 20 years period of the New Local Plan will surely be to halt the blight in the old terraced housing areas because these comprise just over half of Burnley's housing stock & to rejuvenate & make these inner-urban areas into neighbourhoods which will become once again attractive places to live. The New Local Plan needs a foremost vision &/or aspiration to aim to achieve this rejuvenation of the inner-urban half of the ~~town~~^{Borough} by 2032 with a commitment priority to deal with the 2,458 empty dwellings by way of an accelerated programme of restoration or demolition clearance of plots to be used for new-build replacement housing schemes. This will accommodate most if not all the remainder of the residual requirement for 2233 dwellings during the 20 years New Local Plan period to 2032.

The 209 net additional dwellings per annum figure, page 41 para. 4.2.14, is substantially more, plus 39.3%, than the "high" growth option of 150 dwellings per annum on page 42. By contrast the cumulative 2012/13 to 2014/15 deficit of 412 dwellings, page 43 para. 4.2.25, means there was a net average of only 72 dwellings per annum in that period & with the following para. 4.2.26 stating "economic constraints are likely to continue in the short to medium term & may continue to suppress housing completions" taken together with Burnley's population projected to reduce by 242 by 2032 all point to a stable or even a slightly reduced overall aggregate demand for extra housing. As a consequence, avoiding housing development on greenfield or Green Belt land, which would engender further urban sprawl into Burnley's rural countryside, should be a

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realistically achievable aim of the New Local Plan.

Summary For the reasons outlined above we do not accept the 'Preferred Options' case for either housing or employment developments to be located outside the 'Issues & Options' urban boundary on greenfield & Green Belt land in the countryside of the rural area because this would increase urban sprawl, exacerbate climate change, mitigate against environmental sustainability & adversely affect biodiversity. Whereas keeping housing & employment developments within the present urban boundary is the only way that the 'Spatial Vision & Objectives' for 'Delivering Sustainable Growth', page 33 para. 3.2.1's No.1, & 'The Natural Environment', page 33 para. 3.2.1 nos. 5 & 6, can be mutually compatible & achievable & that "Focusing development on urban areas" as outlined in 'The Development Strategy', page 47 para. 4.10.2, is complied with.

In the context of the above development rationale our specific objections to the 'Preferred Options' proposals for individual sites are as follows.

HS1/2 Hollins Cross Farm Reasons for objection The proposed new Development Boundary extends beyond the present Urban Boundary to incorporate this plot of land where development would result in increased urban sprawl into the rural area with the loss of a greenfield site in attractive open countryside which is in active agricultural production & is an upland pasture habitat where the L.E.R.N. assessment of Local Plan sites June 2015 report states that species have been recorded with European & NERC Act. sect. 41 protection along with lower B.A.P. long list & Key species & that the site is within 50 metres of lower Woodland & Grassland Ecological Network stepping stone habitat. The site is also next to the Green Infrastructure Strategy's Towneley Park & Timber Hill L.N.R. search area.

HS1/4 land at Rosendale Road Reasons for objection The proposed new Development Boundary extends beyond the present Urban Boundary to incorporate this plot of land where development would result in increased urban sprawl into the rural area with the loss of a greenfield site in attractive open countryside in a very prominent elevated position in the landscape which is in active agricultural production. The L.E.R.N. assessment of local Plan sites June 2015 report states that species have been recorded with European & NERC Act sect. 41 protection along with lower B.A.P. long list & Key species, Wildlife & Countryside Act schedules 1, 5 & 8 species have been recorded within 250 metres of the site, the site is in the Historic Woodland Survey & intersects lower Woodland & Grassland Ecological Network stepping stone habitat

HS1/5 Former Boxi site Reasons for objection This site is on the river Calder floodplain & because of this it is unsuitable for housing. The L.E.R.N. assessment of local Plan sites June 2015 report states that species have been recorded with European protection along with lower B.A.P. long list & Key species, Wildlife & Countryside Act schedules 1, 5 & 8 species have been recorded within 250 metres of the site & a hot root has been recorded within 100 metres of the site. The site is part of the lower Grassland Ecological Network & is next to the Green Infrastructure Strategy's river Calder wetlands L.N.R. search area also proposed as a Burnley Wildlife Site.

HS1/7 Ridge Wood Reasons for objection This Burnley Borough Council owned land is a millennium 'Forest of Burnley' tree-planted site managed similarly to the adjacent Rowley tip reclamation site part of the Brun Valley Forest Park which is also part of the Green Infrastructure Strategy's river Brun & river Don including B.V.F.P.'s L.N.R. search area & the site forms part of the lower Woodland Ecological Network. This site was added at
(.P.T.O.)

The 'Preferred Options' July 2016 document stage, subsequent to the L.E.R.N. assessment of local Sites June 2015 report & requires a L.E.R.N. assessment before its development status can be determined.

HS1/9 Red Lees Road, Clwiger Reasons for objection The ^{proposed} new Development Boundary extends beyond the present Urban Boundary to incorporate this plot of land where development would result in increased sprawl into the rural area with the loss of a prominent greenfield site in attractive open countryside which is in active agricultural production. The L.E.R.N. assessment of local Plan sites June 2015 report states that species have been recorded with European & N.E.R.C. Act sect. 41 protection along with lower B.A.P. long list & Key species. The site is within 250 metres of the Ormesod & Gin Woods B.H.S. & is close to the Green Infrastructure Strategy's Towneley Park/Junker Hill h.N.R. search area & is within 50 metres of the lower Woodland Ecological Network & forms part of the wildlife links network for these areas.

HS1/10 Higher Saxfield Reasons for objection The proposed new Development Boundary extends beyond the present Urban Boundary to incorporate this plot of land where development would result in increased sprawl into the rural area with the loss of a prominent greenfield site in attractive open countryside comprising natural & semi-natural grassland habitat. The L.E.R.N. assessment of local Plan sites June 2015 report states that species have been recorded with European & N.E.R.C. Act sect. 41 protection along with lower B.A.P. long list & Key species, Wildlife & Countryside Act schedules 1, 5 & 8 species have been recorded within 250 metres of the site & a bat roost has been recorded within 400 metres of the site.

HS1/15 Former Heekenhurst resr. Reasons for objection The proposed new Development Boundary extends beyond the present Urban Boundary to incorporate this plot of land where development would result in increased sprawl into the rural area with the loss of a prominent greenfield site in attractive open countryside which is in active agricultural production. The L.E.R.N. assessment of local Plan sites June 2015 report states that species have been recorded with European & N.E.R.C. Act sect. 41 protection along with lower B.A.P. long list & Key species within 250 metres of the site. The Haughton Hag B.H.S., also an Ancient Woodland Inventory site, is with 250 metres of the site & the Michelin factory/Smallshaw ind. est., Swinden Bridge Valley & Horstwell B.H. Sites are within 1 km. of the site. Also, the lower Woodland & Grassland Ecological Network & the river Don, river Don including Brun Valley Forest Park L.N.R. search area are in close proximity to the site which forms part of the wildlife links network for these areas.

HS1/25 Ridge Avenue Reasons for objection This site was planted with trees as part of the millennium 'Forest of Bursley' project & it forms part of the lower Woodland Ecological Network & is adjacent to its Grassland Network on the Rowley tip reclamation site part of the Brun Valley Forest Park which in turn is part of the Green Infrastructure Strategy's river Don & river Don including B.V.F. Park's L.N.R. search area. The L.E.R.N. assessment of local Plan sites June 2015 report states that species have been recorded with European & N.E.R.C. Act sect. 41 protection along with lower B.A.P. long list & Key species within 250 metres of the site & a bat roost has been recorded within 400 metres of the site.

HS1/26 Land adjacent to 2 Queens Park Road Reasons for objection This is a greenfield site close to Queens Park & it is also adjacent to the Brun Valley Forest Park which in turn is both part of the Green Infrastructure Strategy's river Don & river Don including B.V.F. Park's h.N.R. search area & the lower Woodland & Grassland Ecological Network. This site was added at the 'Preferred Options' July 2016 document stage, subsequent to the L.E.R.N. assessment

of local Sites June 2015 report & requires a L.E.R.N. assessment before its development status can be determined.

HS1/28 land to rear of Bull & Butcher Reasons for objection The proposed new Development Boundary extends beyond the present Urban Boundary to incorporate this plot of land where development would result in increased urban sprawl into the rural area with the loss of a greenfield site in attractive open countryside comprising natural & semi-natural grassland. The L.E.R.N. assessment of Local Plan sites June 2015 report states that species have been recorded with European & N.E.R.C. Act sect. 41 protection along with lower. B.A.P. long list & Key species & Wildlife & Countryside Act schedules 1, 5 & 8 species

EMP1/1 Rossendale Road north Reasons for objection The proposed new Development Boundary extends beyond the present Urban Boundary to incorporate this plot of land where development would result in increased urban sprawl into the rural area with the loss of a greenfield site in attractive open countryside in a very prominent elevated position in the landscape which is in active agricultural production. The L.E.R.N. assessment of local Plan sites June 2015 report states that species have been recorded with European & N.E.R.C. Act sect. 41 protection along with lower. B.A.P. long list & Key species & Wildlife & Countryside Act schedules 1, 5 & 8 species have been recorded within 250 metres of the site, the site is in the Historic Woodland Survey & intersects lower. Woodland & Grassland Ecological Network stepping stone habitat.

EMP1/5 Land south of Network 65 Reasons for objection The proposed new Development Boundary extends beyond the present Urban Boundary to incorporate this plot of land where development would result in increased urban sprawl into the rural area with the loss of a greenfield site in attractive open countryside in a very prominent elevated position in the landscape which is in active agricultural production. The L.E.R.N. assessment of local Plan sites June 2015 report states that species have been recorded with European protection along with lower. B.A.P. long list & Key species & species with N.E.R.C. Act sect. 41 & Wildlife & Countryside Act schedules 1, 5 & 8 have been recorded within 250 metres of the site. The site is part of the lower. Grassland Ecological Network & is within 1 km. of the Pollard Moor/Bentley Wood Green, Grogney Bank Clough & Houghton Hey Plantation B.H.S. sites

EMP1/9 Innovation Drive Reasons for objection A significant part of the easternmost of the 3 plots of land proposed forms part of the former Michelin/Smulders ind. est. B.H.S. & is adjacent to the Green Valley/river Don B.H.S. (this information is not included & needs to be added to EMP1/9's 'Policy Requirements & Design Principles') & is part of the lower. Woodland Ecological Network & so the easternmost of the 3 plots should be excluded from this development site. This site was added at the 'Preferred Options' July 2016 document stage, subsequent to the L.E.R.N. assessment of Local Sites June 2015 report & requires a L.E.R.N. assessment before its development status can be determined.

EMP1/12 Burnley Bridge extension Reasons for objection The proposed new Development Boundary extends beyond the present Urban Boundary to incorporate this plot of land whilst at the same time removing its present Green Belt status unreasonably because exceptional circumstances do not apply as there are alternative development sites outside the Green Belt. It would increase urban sprawl into the rural area with the loss of a greenfield site in attractive open countryside which is in active agricultural production. It is adjacent to the Pollard Moor/Bentley Wood Green B.H.S. & is part of the lower. Grassland Ecological Network. The L.E.R.N. assessment of local Plan sites June 2015 report states that species have been recorded with European protection along with lower. Key species within 250 metres of the site

EMPI/13 Shuttleworth Mead south Reasons for objections The proposed new Development Boundary extends beyond the present Urban Boundary to incorporate this plot of land whilst at the same time removing its present Green Belt status unreasonably because exceptional circumstances do not apply as there are alternative development sites outside the Green Belt. It would increase urban sprawl into the rural area with the loss of a greenfield site in attractive open countryside which is in active agricultural production. The site is on the river Calder floodplain in flood zone 2 & other alternative development sites are above the flood zone. The L.E.R.N. assessment of local Plan sites June 2015 report states that species have been recorded with European & N.E.R.C. Act sect. 41 protection along with Lancs. B. A. P. Long list & Key species. The site is part of the Lancs. Woodland & Grassland Ecological Network & is within 250 metres of the Shuttleworth Wood B. H. S. which is also an Ancient Woodland Inventory Site.

Section 1 Introduction In 1.3 'The Preferred Options local Plan', on page 3, para. 1.3.2's first 'bullet point', "Section 2 provides a concise geographic, economic & social portrait" has omitted "environmental" which needs adding in order to be consistent with it being included in the last sentence of the last 'bullet point' & in page 4's para. 1.4.3.

Local Nature Reserves In the part of the Biodiversity section devoted to local Nature Reserves, page 24 para. 2.7.16 states "the land area of L.N.R.'s in Burnley totals 8.27 hectares". However, in the Natural Environment section devoted to L.N.R.'s, page 159 para. 5.5.10 refers to Burnley's two L.N.R.'s (the Deeppond & Lowerhouse Lodges) totalling 12.3 hectares, referencing the figure used in Lancs. Wildlife Trust's "Assessment of community nominated L.N.R. sites" 2008 report. For comparison, the Deeppond & Lowerhouse Lodges both also being designated Biological Heritage Sites, their B.H.S. areas are 1.3 ha. & 7.7 ha. respectively, totalling 9.0 ha. The correct hectares totals for each of the Deeppond & Lowerhouse Lodges L.N.R.'s need to be established & then totalled in order that the resultant shortfall L.N.R. figure is accurate.

Local Nature Reserves: omission of 'search areas' Reasons for objection Burnley has only two L.N.R.'s at the Deeppond & Lowerhouse Lodges, designated in 1999 & 2000 respectively, & further L.N.R. designations are overdue. The Green Infrastructure Strategy, page 32, refers to Burnley's L.N.R. provision being below the Natural England recommendation of 1 ha. per each 1000 of population & identifies 4 L.N.R. 'search areas' for new designations (identified on the basis that they can also form part of the biodiversity network, are of high biodiversity value & are close to areas of population) at Towneley Park/Junker Hill, river Calder washlands, river Brun & river Don including Brun Valley Forest Park & a Lowerhouse Lodges L.N.R. expansion. Although the Preferred Options 'Natural Environment' section devoted to L.N.R.'s, page 24 para. 2.7.14 to 16, states that "the land area of L.N.R.'s in Burnley totals 8.27 hectares, far short of the 87 hectares recommended for Burnley's population" it fails to mention the Green Infrastructure Strategy's 4 L.N.R. 'search areas' & whilst the Issues & Options map illustrated the 4 L.N.R. 'search areas' these have been removed from the Preferred Options map. Further L.N.R. provision will contribute positively to enhancing biodiversity conservation, environmental sustainability & climate change mitigation & should be an important aspiration of the New local Plan & the 4 L.N.R. 'search areas' should be referred to & individually listed in an addition to the two L.N.R. sections, page 24 para. 2.7.14 to 16 & page 159 para. 5.5.12 & these 4 L.N.R. 'search areas' should be re-instated on the Preferred Options map.

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Sports & Leisure Facilities Regarding the Borough's most important angling waters listed, page 28 para. 2.8.19, Lowerhouse Lodges, Cornfield & Swinden res. need to be added.

Natural Environment

In the final part of the last sentence of page 161's para. 5.5.24 "right for the species & the area" is too vague & should be more specific & replaced by "appropriate for the range of habitats present & the flora & fauna species likely to be found in them". In the following para. 5.5.25's last sentence it would be better to remove "Face & part" from its beginning & simply state "Advice on certain developments is available from Natural England" so that developers are not deterred from making initial enquiries to Natural England.

Regarding Policy NE1: Biodiversity & Ecological Networks, page 161's No.1 should be more robust by explicitly referring to compliance with NPPF's para. 9 & accordingly replaced by "To comply with the NPPF paragraph 9 requirement for sustainable development to involve moving from a net loss of biodiversity to achieving net gains for nature all development proposals should at the least maintain the present level of biodiversity & where possible enhance it."

In the Landscape Character section, in page 165's para. 5.5.43 the following should be added to the end of the final sentence: "to maintain or where possible enhance biodiversity."

In the Trees, Hedgerows & Woodland section, page 166 para. 5.5.45, in the second sentence remove "can often be taken for granted but" a generalise assumption/ impression which is too negative, out of place & not needed in a section devoted to positively valuing & protecting trees, hedgerows & woodland.

Green Infrastructure

The final sentence of page 58's para. 6.6.9 needs to be more specific & in this respect especially needs to remove the phrase "light touch audit" which has a flippant connotation. A more appropriate final sentence needs to be on the following lines: "For other development proposals G.I. Audits, Environmental Impact Assessments & Wildlife Surveys/Habitat Impact Assessments will be required as appropriate, commensurate with the extent of a development proposal's impact on the environment."

Yours faithfully,

PETER HORNBY

p.p. Bursley Wildlife Conservation Forum

24/8/16

